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6 Attorneys for Defendants
COUNTY OF LOS ANGELES; SHERIFF JIM MCDONNELL; COMMANDER
7 PATRICK MAXWELL; CAPTAIN JACK EWELL; SERGEANT SEAN BURKE;
DEPUTY ANTHONY GEISBAEUER; DEPUTY JUAN RODRIGUEZ; DEPUTY
8 EDSON SALAZAR; DEPUTY DONALD MCNAMARA; DEPUTY STEVEN
PRATT; DEPUTY IAN STADE; DEPUTY DANIEL WELLE; AND DEPUTY
9 JAMES WHEELER

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA**

13 DAWN SOARES, TIFFANY
14 SOARES, ALISSA VARNEDOE,
JAYDA MACCASKIE AS MOTHER
15 AND NATURAL GUARDIAN FOR
MINOR CHILDREN "J.V." AND
16 "S.V.", CHILDREN OF DECEDENT,
AND SUCCESSORS OF INTEREST,
17 HEIRS.

18 Plaintiffs,

19 v.

20 COUNTY OF LOS ANGELES,
SHERIFF JIM McDONNELL,
21 CAPTAIN JACK EWELL,
SERGEANT SEAN BURKE, DEPUTY
22 ANTHONY GEISBAUER, DEPUTY
JUAN RODRIGUEZ, DEPUTY
23 EDSON SALAZAR, DEPUTY
DONALD MCNAMARA, DEPUTY
24 STEVEN PRATT, DEPUTY IAN
STADE, DEPUTY DANIEL WELLE,
25 DEPUTY WHEELER; and DOES 1 -
10,

26 Defendants.

CASE NO.: 2:17-cv-00924 RGK-AS

Assigned to Hon. R. Gary Klausner

**DECLARATION OF DOUGLAS L.
DAY IN SUPPORT OF
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY
JUDGEMENT ON PLAINTIFFS'
MONELL CLAIM**

[Filed Concurrently with Defendants
Notice of Motion and Motion for
Summary Judgment, Statement Of
Uncontroverted Facts; (Proposed) Order]

DATE: April 16, 2018
TIME: 9:00 a.m.
CTRM: 850, 8th Floor

1

2 **DECLARATION OF DOUGLAS L. DAY**

3 1. I am an attorney at law duly licensed and entitled to practice in the
4 State of California, and have been admitted to practice before this United District
5 Court for the Central District of California since 1980, as well as before the
6 Southern, Northern and Eastern Districts of California, the Ninth Circuit Court of
7 Appeal, and the United States Supreme Court. I am an associate in the Law Offices
8 of Harold G. Becks & Associates and am one of the attorneys with primary
9 responsibility for the handling of this case on behalf of the Defendants herein. In
10 that capacity, I am personally familiar with the facts set forth herein and if called as
11 a witness in this case, I could and would competently testify hereto.

12 2. Attached hereto as and marked as Exhibit "A" is a true and correct
13 copy of Defendant Sheriff Jim McDonnell's Special Interrogatories to Plaintiff,
14 Alissa Varnedoe – Set One.

15 3. Attached hereto as and marked as Exhibit "B" is a true and correct copy
16 A true and correct copy of Plaintiff Alissa Varnedoe's Responses to Defendant
17 Sheriff Jim McDonnell's Special Interrogatories – Set One.

18 I declare under penalty of perjury under the laws of the United States that the
19 foregoing is true and correct.

20 Executed on March 14, 2018 at Los Angeles, California.

21
22 /s/ Douglas L. Day
23 Douglas L. Day
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PROOF OF SERVICE

Soares v. County of Los Angeles, et al.
USDC Case No.: 2:17-cv-00924

I am employed in the City of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 3250 Wilshire Boulevard, Suite 708, Los Angeles, California 90010.

On **March 14, 2018**, I served the foregoing document described as: **DECLARATION OF DOUGLAS L. DAY IN SUPPORT OF DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGEMENT ON PLAINTIFFS' MONELL CLAIM**, to all interested parties in this action by a true and accurate copy thereof, enclosed in sealed envelopes, addressed as follows:

Tristan G. Pelayes, Esq.
Armanda J. Parker, Esq.
WAGNER & PELAYES, LLP
1325 Spruce Street, Suite 200
Riverside, CA 92507
Tel: (951) 686-4800
Fax: (951) 686-4081

Attorney for Plaintiffs

☒ **BY ELECTRONIC E-FILEING:** (IN COMPLIANCE WITH L.R.5-3-2.1) on **March 14, 2018**, at my place of business.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on **March 14, 2018**, at Los Angeles, California.

/s/ Sara Justice
Sara Justice